

Response

The claims were amended in accordance with the amendments above. The amendments are being made to clarify the invention, to focus the claims on those aspects of the invention which are a commercial priority to the assignee, and to correct grammatical errors in the claims. The amendments are fully supported by the specification, claims, and figures as originally filed. No new matter is believed or intended to be involved. In addition, the Applicants submit that the present amendments to the claims do not raise new issues, and that the present amendments place the application either in better condition for allowance or in better form for appeal, such that the amendments to the claims will require only cursory review.

In particular, the amendments to claim 2 are merely formal, while the amendments to claims 4 and 5 simply incorporate a limitation similar to a limitation found in claim 1 (i.e., a second object is displayed as a child of the first object). Accordingly, Applicants respectfully request that the present amendments be entered.

Claims 2-5 were rejected under 35 U.S.C. §102(e) as being anticipated by Barney et al. (U.S. Patent No. 6,212,512). Under MPEP 2131, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim. In addition, the elements in the prior art reference must be arranged as required by the claim. MPEP 2131 (emphasis added).

Applicants note that the art of record fails to teach or suggest all of the limitations recited in each independent claim, particularly in the arrangement required by each of the claims. For instance, and without limitation, the art of record fails to teach or suggest a second object being displayed as a child of a first object, as recited in each of the present claims. Applicants note that the claim terms “object” and “child” have been given particular, special meaning in the present specification, in accordance with MPEP 608.01(o), and respectfully submit that the proper meaning of these terms has not been appreciated in either of the Office Actions issued thus far.

With respect to the term “object,” which is recited in each of the present claims, Applicants note that the term is aptly and explicitly defined in paragraph [0048] of the present specification as “a single entity of a specific type of information. As an example, a file is an object, and an event is an object. Calendars, contacts, URLs, and other embodiments of information may also be considered to be objects.” “Objects” do not include directories/folders or subdirectories/subfolders. (see, e.g., paragraph [0016]). Accordingly, as permitted by MPEP 2111.01, Applicants acted as their own lexicographers with respect to the term “object.” Applicants therefore submit that the term “object,” as recited in the present claims, should be given the meaning set forth in the present specification, which is different than some standard dictionary definitions of the term “object.”

With respect to the term “child,” which is recited in each of the present claims, applicants note that the term, as properly construed in view of the specification, indicates a hierarchal or organizational relationship between two or more objects. For instance, paragraph [0059] of the present specification notes that “[a] virtual child to virtual parent relationship, in a virtual file system, reflects an organizational dependency.” Applicants submit that it would be immediately apparent to one of ordinary skill in the art that, as a matter of hierarchical organization, a child depends from a parent. In the context of the tree analogy described in paragraph [0009], a leaf typically depends from a twig (such that the leaf is the “child” of the twig), a twig depends from a branch (such that the twig is a “child” of the branch), a branch depends from a trunk (such that the branch is a “child” of the trunk), and so forth.

Thus, in view of the above definitions of “object” and “child,” Applicants again note that each of the present claims recite that a second object is displayed as a child of a first object. In accordance with the above definitions, as well as the context provided by the present specification, and pursuant to MPEP 2111.01, this means that one entity of a specific type of information (i.e. a file, event, URL, etc.) is displayed as being organizationally dependent from another entity of a specific type of information (i.e. another file, event, URL, etc.). An example of this claimed limitation is illustrated in Figure 1 of the present application, which shows an object (130)(in the form of a contact) which is displayed as being organizationally dependent from another object (110)(in the form of a .swf file). In other words, in accordance with the

present claims, a file is playing a role traditionally reserved for folders only – that being the role of parent to another file. Applicants respectfully submit that such elements, being arranged as required by the claims, are neither shown nor suggested by Barney et al., such that an anticipation rejection is improper.

Applicants again note the emphasis in Barney et al. that a traditional folder-as-parent, file-as-child organizational hierarchy be used. In particular, in Col. 9, ll. 60-62, Barney et al. admonishes “for a file to appear in Right Pane, all of its parent folders in the tree format up to the root Data Vault Folder Item must be opened.” (item numbers omitted, emphasis added). Nowhere does Barney et al. demonstrate any contemplation of an object being displayed as a parent of another object, which is inherently recited in the claims as one object being displayed as a child of another object (i.e. of a parent object). Applicants attempted to make this point in their prior response, and the present Office Action purported to respond to this observation by noting unrelated teachings of Barney et al., such as the ability to group information based on various criteria, providing a hierarchy rooted from a specific removable storage medium, or a hierarchy which reflects the original source of the information (citing Col. 3, ll. 5-15). Applicants note that such teaching simply lacks sufficient detail to constitute a teaching or suggestion of one “object” being displayed as organizationally dependent from another “object,” as recited in the claims. In other words, it fails to disclose a file (or other object) being the child of another file (or other object). Indeed, to the extent that the cited passage of Barney et al. teaches any parent/child-type hierarchical relationship, the disclosed parent (i.e., a specific removable storage medium) is not an “object” as recited in the present claims, per the explicit definition of “object” provided in the present specification and per the context provided by the present specification. Similarly, a teaching of the grouping of information based on various criteria does not constitute a teaching of two “objects” being in a parent/child hierarchical relationship; nor does a teaching of a hierarchy reflecting the original source of information constitute a teaching of two “objects” being in a parent/child hierarchical relationship. Accordingly, for at least the foregoing reasons, the present independent claims are neither anticipated nor rendered obvious by the art of record.

While several distinctions have been noted over the art of record, Applicants note that there are several other limitations recited in the present claims which are neither taught nor suggested by the art of record. Applicants expressly reserve all rights and arguments with respect to distinctions not explicitly noted herein. In addition, to the extent that the amendments constitute a narrowing of the claims, such narrowing of the claims should not be construed as an admission as to the merits of the prior rejections. Indeed, Applicants traverse the rejections and preserve all rights and arguments.

Based on the foregoing all pending claims are in a condition for allowance. Accordingly, Applicants submit that all pending claims overcome the rejections presented in the Office Action, and respectfully request reconsideration and an early notice of allowance.

Respectfully Submitted,



Andrew B. Ulmer (Reg. No. 57,003)
Frost Brown Todd LLC
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202-4182
513-396-4811 (direct)
513-651-6981 (fax)

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